

ABELSON & TRUESDALE, LLC

By: Steven J. Abelson, Esq.

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Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

GREGORY & DIANA NAPOLI

Debtors

Case No. 14-10198 (CMG)

Chapter 13

**MOTION TO ENFORCE COURT
ORDERS OF 6/6/16 & 7/26/16;
HOLDING CREDITOR IN CONTEMPT
FOR FAILURE TO COMPLY WITH
COURT ORDERS AND DAMAGES
AND SANCTIONS**

Hearing Date: **SEPT. 7, 2016 @ 9:00 A.M.**

To: Clerk, United States Bankruptcy Court
United States Bankruptcy Court
402 E. State Street
Trenton, New Jersey 08608

Albert Russo, Trustee
CN 4853
Trenton, NJ 08650

Statebridge Company, LLC
5680 Greenwood Plaza Blvd
Suite 100S
Greenwood Village, CO 80111

*Attn: Officer, Director, Managing Agent or Other Individual Authorized to
Accept Service of Process*

William Miller, Esq.
Stern & Eisenberg, PC
1040 N. Kings Highway, Suite 407
Cherry Hill, NJ 08034
Attorney for Statebridge Co.

PLEASE TAKE NOTICE that on September 7, 2016 at 9:00 in the forenoon, or as soon as counsel may be heard, the undersigned attorney for the Debtors, Gregory & Diana Napoli will cross move before the UNITED STATES BANKRUPTCY COURT, Honorable Christine M. Gravelle, presiding, 402 E. State Street, TRENTON, NEW JERSEY, 08608 for an Order Enforcing the Terms of the Court's 6/6/16 and 7/26/16 Orders and holding the Creditor Statebridge Co. in contempt for its failure to comply with same and for additional damages for the necessity of the within application.

PLEASE TAKE FURTHER NOTICE that Debtor shall rely upon the attached certification in support of the application and that pursuant to Local Rule 9013-1, it is submitted that no brief is necessary as issues presented are clear and concise, oral argument is not requested and a proposed form of order is submitted herewith.

/s/ Steven J. Abelson
STEVEN J. ABELSON, ESQ.
Attorney for Debtors

Dated: July 31, 2016